

UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

IN RE:) CASE NO: 15-14696
)
JAMES P. KEANE)
)
) JUDGE ARTHUR I. HARRIS
)
DEBTOR.) Chapter 7
)
) **MOTION TO AVOID LIEN**
) **OF SHEEN FALLS STRATEGIES, LLC**

Now comes the Debtor, by and through counsel, and moves this Honorable Court pursuant to 11 U.S.C. 522(f) for an Order avoiding the lien of Sheen Falls Strategies, LLC on the following grounds:

1. The Debtor owns the real property at 22250 Hilliard Blvd., Rocky River, Ohio 44116. This parcel is valued by the Cuyahoga County Auditor for \$210,300.00. (See attached County appraisal)
2. There is one mortgage on the property held by Greentree Servicing for \$236,732.00.
3. The Debtor is moving to avoid Judgment Lien held by Sheen Falls Strategies, LLC for approximately \$50,000.00 plus accrued interest (Cuyahoga County Common Pleas Court case no JL-14-694669).
4. After subtracting the balance of the first mortgage from

the value of the parcel herein, there is no equity to support the lien of Sheen Falls Strategies, LLC.

5. Debtor has claimed a homestead exemption pursuant to ORC 2329.66(A)(1). However, the amount of Debtor's claimed exemption is zero, as the value of the parcel herein is less than the balance of the first mortgage.

WHEREFORE, the Debtor requests that this Honorable Court grant Debtor's Motion to avoid said lien of Sheen Falls Strategies, LLC (JL-14-694669).

Respectfully Submitted,

/S/ Fred P. Lenhardt
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Cleveland, OH 44124
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CERTIFICATE OF SERVICE

I certify that on November 4, 2015, a true and correct copy of Debtors' Motion to Avoid Lien was served:

Via the Court's Electronic Case Filing System on these entities and individuals who are listed on the Court's Electronic Mail Notice List:

Waldemar Wojcik trustee wwojick@wojciklpa.com

United States Trustee (Registered address)@usdoj.gov

And by CERTIFIED MAIL to:

Sheen Falls Strategies, LLC
Mr. P. Michael Ward,
It's Statutory Agent
Reminger Service Company, Inc.
101 West Prospect Ave., Ste. 1400
Cleveland, OH 44115

/s/Fred P. Lenhardt
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